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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 CARLA PETERSON,  
14 Defendant.

Case No. 2:19-cr-00119-JAD-NJK

**SECOND STIPULATION TO  
MODIFY PRETRIAL RELEASE  
CONDITIONS<sup>1</sup>**

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16 IT IS HEREBY STIPULATED AND AGREED, by and between United States Attorney  
17 Nicholas A. Trutanich and Assistant United States Attorney Christopher D. Baker, counsel for  
18 the United States of America, and Federal Public Defender Rene L. Valladares and Assistant  
19 Federal Public Defender Sylvia Irvin, counsel for Carla Peterson, that her conditions of release  
20 be modified for the following reasons:

21 1. On June 6, 2018, Ms. Peterson made her initial appearance and was released on a  
22 personal recognizance bond with specified conditions of pretrial release. *See* ECF No. 13. On  
23 February 20, 2020, Ms. Peterson entered a plea of guilty pursuant to a negotiated plea agreement.  
24 *See* ECF Nos. 37-39. At a hearing later that afternoon, she was admitted into the RISE Court  
25 program. *See* ECF Nos. 40-41.  
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<sup>1</sup> This motion is timely filed. There is no deadline for the filing of this motion.

2. As a participant in RISE, Ms. Peterson is subject to her RISE Court contract (ECF No. 41) and conditions of pretrial release including that “The defendant is allowed to travel with prior approval from Pretrial Services.” ECF Nos. 35, ¶74; 13.

3. In mid-September, Ms. Peterson accepted an employment position as a regional sales representative. Because her employment requires travel, undersigned counsel asked the Court to modify her travel condition to allow to travel within Nevada and to Washington, Oregon, California, and Arizona. ECF No. 64. This Court granted the modification. ECF No. 65.

4. Recently, Ms. Peterson learned that her employer would like her to travel to Montana, Idaho, and Utah. Consequently, counsel ask this court to modify Ms. Peterson’s travel restriction to allow her to travel within the continental United States.

5. Undersigned defense counsel consulted with the Pretrial Services Officer Samira Barlow, and she agrees with the modification of this request.

6. Defense counsel and Government counsel agree to the modification of this pretrial condition.

7. Ms. Peterson continues to be in compliance with her pretrial release conditions.

DATED this 13th day of October, 2020.

RENE L. VALLADARES  
Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

*/s/ Sylvia Irvin*  
By \_\_\_\_\_

SYLVIA IRVIN  
Assistant Federal Public Defender

*/s/ Christopher D. Baker*  
By \_\_\_\_\_

CHRISTOPHER D. BAKER  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4

5 Plaintiff,

6 v.

7 CARLA PETERSON,  
8

9 Defendants.

Case No. 2:19-cr-00119-JAD-NJK

**ORDER**

10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that following modifications shall be made to Ms.

12 Peterson's release conditions:

- 13 1. The defendant may travel withn the continental United States.

14 DATED this 13th day of October, 2020.

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17 UNITED STATES MAGISTRATE JUDGE  
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